



## Third Taxing District

2 Second Street  
East Norwalk, CT 06855

Tel: (203) 866-9271

Fax: (203) 866-9856

Third Taxing District of the City of Norwalk

Special Telephonic Commission Meeting

**Monday, May 14, 2018 at 12:00 p.m.**

Call-in Number: 203-939-1857, Pin 1855

1. Public Comment – 15 Minute Limit
2. Discussion of Listing of Historical Cemetery and Other District Resources on Federal/State Historical Registers – A/R
3. Eversource Undergrounding – Review and Approval of Letters to Various Agencies – A/R (Pgs. 1-15)
4. Adjourn

\*A/R – Action Required/See Attached Motion

Agenda backup material is available at the TTD office, [www.ttd.gov](http://www.ttd.gov) and will be available at the meeting.

M:\Shared\ Commission Meeting Information\Agenda 5-14-18.doc

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### *District Commissioners*

<b>David L. Brown</b>	203-866-8099	Chairman	<b>Kevin Barber</b>	203-866-9271	General Manager
<b>Debora Goldstein</b>	203-252-7214	Commissioner	<b>Ron Scofield</b>	203-866-9271	Assistant General Manager
<b>Pamela Parkington</b>	203-858-4261	Commissioner	<b>Johnnie Weldon</b>	203- 216-2652	Treasurer



## Third Taxing District

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East Norwalk, CT 06855

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Fax: (203) 866-9856

May 14, 2018

[Name of Addressee]  
[AGENCY NAME]  
[Address1]  
[Address2]  
[City State Zip]

**RE: CP-241 Walk Bridge Replacement Project 115kv Transmission Line Relocation  
By Eversource Energy in Norwalk, CT**

Dear [Addressee],

We, the Commission of the Third Taxing District-City of Norwalk ("TTD"), representing the body politic of a separate municipal corporation within the City of Norwalk<sup>1</sup> have become concerned about the proposed project to relocate two 115kv transmission lines within the boundaries of the Third Taxing District.

Despite being a significant stakeholder *as a representational governing body of the impacted area*, the TTD Commission has been omitted from all discussions regarding the relocation of the transmission lines contemplated by a high tower feasibility plan resulting from plans to replace the Walk Bridge, which initially contemplated aboveground placement of the lines.<sup>2</sup> Though there have been ongoing utility coordination meetings among the staff of the TTD Electric Department and Connecticut's Department of Transportation ("CDOT") engineers, the remit of the staff was to evaluate these plans only as they pertain to connections to the TTD infrastructure.

We later became aware that Eversource Energy, in consultation with the City of Norwalk and CDOT, had completely revised the plan to instead provide for undergrounding of the transmission lines beneath the Harbor and portions of Veterans Memorial Park. This option was presented as the best of fourteen options that were considered, though at no time was the public (or the TTD as representatives of the rate-payers in East Norwalk) provided an opportunity to provide input on those options.<sup>3</sup> We note that the Norwalk Harbor Management Commission has also objected to being omitted from discussions about alternatives, despite its jurisdiction under Connecticut General Statutes and Norwalk Code.

We are writing to lay out a number of concerns relating to this project on behalf of the residents and businesses of the Third Taxing District in the neighborhood of East Norwalk, who already stand to suffer significant impact from the Walk Bridge project.

### ***Environmental***

<sup>1</sup> *Special Acts No. 352 (1933); Charter of the Third Taxing District of the City of Norwalk*, Section 1-114. Under the definition of "municipality" found in 7-233b (9), TTD is a municipality by virtue of ownership of an electric utility with the authority to "produce, supply or distribute electric energy". The TTD is governed by three elected commissioners with full municipal powers, including the authority to tax and to make appropriations under the charter Sec. 1-114; 117-118, and who function as the legislative body of the municipality.

<sup>2</sup> *Norwalk task force demands project manager as DPW leader begs for help with ConnDOT*, Nancy on Norwalk, August 3, 2016 (<https://www.nancyonnorwalk.com/2016/08/norwalk-task-force-demands-project-manager-as-dpw-leader-begs-for-help-with-conndot/>)

<sup>3</sup> *Eversource presents proposed route for 115-kilovolt transmission lines*, The Hour, May 26, 2017 (<https://www.thehour.com/news/article/Eversource-presents-proposed-route-for-11171856.php>)

### ***District Commissioners***

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Debra Goldstein	203-252-7214	Commissioner	Ron Scofield	203-866-9271	Assistant General Manager
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We, the Commission have significant concerns about the environmental impacts of undergrounding the lines, particularly with the path currently under consideration.

The proposed route, under the harbor, through the visitor's docks and under a section of Veterans Memorial Park presents a unique need for extreme sensitivity to possibility of environmental contamination. Veterans Memorial Park sits on a former dump, but was created before the state Department of Environmental Protection had a permitting process for old dumps, so it has never been comprehensively tested. It abuts the harbor, which is the home of shellfish beds that make up a significant, economically important, shellfish industry, which supplies seafood to much of the East Coast and as far away as Texas. The project requires both trenching and horizontal directional drilling in an area which has historically been home to manufacturing of all kinds, including numerous hat factories.

Yet, this project stands to escape the need for any significant environmental review, or opportunities for public comment. Though the relocation of the utility lines was not eligible for full environmental review under the Environmental Assessment/Section 4(f) Evaluation/Environmental Impact Evaluation for State Project No. 0301-0176 Walk Bridge Replacement Project, because the project is one of "independent utility", it should be noted that that document represented that an independent environmental review would be required **[emphasis ours]**.

Due to the removal of the high towers, Eversource Energy high voltage transmission lines that currently cross the Norwalk River on the high towers will require relocation. The relocation of the utility functions on the high towers is not part of the Walk Bridge Replacement Project, but will be an indirect effect of the project. **The Eversource power relocation will undergo a separate environmental evaluation and permitting process, which will include opportunities for public review and comment.** Eversource Energy will be responsible for relocating its lines and the associated environmental evaluations and permits. (Page 3-171)

The relocation of the overhead electric transmission lines may require approval from the Connecticut Siting Council (CSC). Should CTDOT lead the transmission line relocation, then approval from the CSC may not be required. **Should the utility company (Eversource) lead the transmission line relocation effort, then CSC review and approval, including a Certificate of Environmental Compatibility and Public Need, would be required.** NEPA review and site-specific permits also could be required for the utility line relocation. (Page 7-3)

The EA/4(f)/EIE representations regarding an environmental review of this project have turned out to be erroneous. Its nature as a relocation (as opposed to new) of an existing structure, its date of installation and the size of the lines (115kv), make it eligible to apply for a Declaratory Ruling from the Connecticut Siting Council ("CSC") that no Certificate of Environmental Compatibility and Public Need is required. Eversource has already indicated that intends to apply for such a ruling.<sup>4</sup>

We have further taken note of, and support, objections made by the Norwalk Shellfish Commission, which has expressed concerns, as follows: "We are also concerned about the proximity to the harbor of the two (3600ft2 West bank, 2700ft2 East bank) pits to be used in the HDD process. We question if they are too close to the harbor to contain potential drilling mud issues. Additionally, we have not seen data to indicate the drilling path is deep enough or is accounting for potential fissures or irregularities in the substrate which would allow drilling mud to enter the environment vertically from the bore hole."

The Commission has had an opportunity to review the report of the expert retained by the Norwalk Harbor Management Commission to conduct an independent peer review, dated March 26, 2018, and has concerns about the environmental impacts of the horizontal directional drilling process. The report notes that the need for petroleum-based lubricants in the drill mud has the potential for additional contamination, in that it can spill beyond the launch pit, leech out subterraneously, or travel through unanticipated underground estuaries or

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<sup>4</sup> Eversource Transmission Relocation Project in support of Walk Bridge Replacement Project, presentation by Eversource to Norwalk Harbor Management Commission, May 24, 2017, page 6.

abandoned conduits to areas that are substantially distant from the boring path. We note again, the proximity of Norwalk's economically and ecologically vital shellfish beds.

### ***Historical***

The loss of historical structures also needs further attention on behalf of the Third Taxing District's constituents, given the view of the harbor that many enjoy directly from their homes, or indirectly from public facilities within the district.

The Environmental Assessment/Section 4(f) Evaluation/Environmental Impact Evaluation for State Project No. 0301-0176 Walk Bridge Replacement Project, recognizes the high towers carrying the transmission lines (as well as catenary lines) that are currently located on the Walk Bridge as "linear historic resources" eligible for the National Register of Historic Places.

Two high towers, located on the east and west sides of the Norwalk River over the rail corridor, carry 22 Metro-North aerial power conductors and aerial communication/signal cables, and eight Eversource Energy 115kV transmission lines. The towers are steel latticed frame, and were constructed in 1912 and rehabilitated in 1990. The tower frames consist of a rigid H-configuration with two lower legs, three horizontal struts connecting the legs, and two sets of primary cross bracing between the lower legs. The towers originally had a height of 199 feet above the base, but were later modified with overbuilds (for the Eversource power lines), increasing their height to approximately 235 feet. (Page 3-4)

The electrification of the line was completed in 1914. In addition to numerous catenary support structures, most of which are original to the electrification, the system includes a high steel-lattice tower on either side of the river to carry transmission lines over the channel. The Engineering Significance Statement for the bridge does not explicitly address the catenary support structures and the two high transmission towers. However, these components are potentially eligible for the NR as contributing elements of the overall rail line as a linear historic resource (NR Criteria A and C). Moreover, in reviewing another project affecting overhead catenary electrification features, CTSHPO noted that the extant catenary system is an integral component of the country's first large-scale electrification of a main line railroad right-of-way and has found the New Haven Railroad Electrification and Catenary System to be a NR eligible entity. The high towers and catenary support structures could also be considered contributing elements to that entity. (Page 3-145)

The Build Alternative will remove the high steel lattice towers on either side of the river that carry transmission lines over the channel. Because the towers represent contributing components of the overall rail line as a NR-eligible linear resource, removal of the towers will result in an adverse effect. The catenary support structures also contribute to the significance of the overall rail line as a NR-eligible linear resource; removal of the structures will result in an adverse effect. (Page 3-154)

The Commission notes that it has previously maintained that the Third Taxing District has had unique impacts from the property takings within the district's boundaries for Walk Bridge construction activities. When a functioning business or dwelling is removed from the District, the revenue from electricity supply to the business or dwelling ceases. Revenue from electric sales within the boundaries of the Third Taxing District serve as a replacement for property taxes for services provided to the district's rate-payers. Due to its status as a municipal electric utility, the District is unable to replace this revenue with new customers. It may not seek to serve customers outside of the district's territory. The TTD has previously inquired after compensatory measures to help mitigate the impacts to its rate-payers from the permanent or extended loss of revenues from property takings.

We note that adverse impacts to NR-eligible resources is a basis for compensatory actions by CDOT, and suggest that it is appropriate to seek such compensatory remedy for the undergrounding of these transmission lines, which are functionally a part of electrical infrastructure that is NR-eligible.

### ***Other Power Lines***

The Environmental Assessment/Section 4(f) Evaluation/Environmental Impact Evaluation for State Project No. 0301-0176 Walk Bridge Replacement Project, reports that there are, in fact, **eight** Eversource 115kv transmission lines currently on the high towers of the Walk Bridge (Page 3-171 and Page 3-4).

The Commission would respectfully request that the plans for the other six lines also be addressed before approval of these two, due to the precedent-setting nature of this proposal.

***Recreational/Harbor View***

The Commission takes note of, and supports the objections of the Norwalk Harbor Management and the Norwalk Shellfish Commissions with regard to the proposed route through the Visitor's Docks.

We refer, again, to report of the expert retained by the Norwalk Harbor Management Commission to conduct an independent peer review, dated March 26, 2018, and wish to register concerns about the possibility that the drill path accuracy cannot be guaranteed. This presents the possibility of damaging the dock pilings, or of being positioned very close to one or more pilings, such that pressure on the pilings from storms or large marine vessels could present the possibility of wear on the transmission line conduits. We note that even accurately positioned transmission lines in this proposal require protective zones which will prevent or severely inhibit the ability to maintain or expand sections of the Visitor's Dock—a facility that the City of Norwalk has a significant investment in, and recognizes significant recreational and economic activity from.

Furthermore, the expert's report raises the possibility that, once dug, it may not be possible to know the exact path of the transmission lines under the harbor with certainty, which can inhibit future activities such as dredging, maintenance/expansion of the Visitor's Docks or other harbor-related activities.

The Commission also makes reference to the Code of Federal Regulations amended 2010 for the Federal Regulatory Commission (Title 18, Volume 1, Section 380-15), which requires that siting of transmission facilities avoid or minimize effects.

Specifically, it states: The siting, construction, and maintenance of facilities shall be undertaken in a way that **avoids or minimizes effects** on scenic, historic, **wildlife**, and **recreational values**.

It further states: In locating proposed facilities, the project sponsor shall, to the extent practicable, **avoid** places listed on, or eligible for listing on, the National Register of Historic Places; natural landmarks listed on the National Register of Natural Landmarks; **officially designated parks; wetlands; and scenic, recreational, and wildlife lands**. **If rights-of-way must be routed near or through such places, attempts should be made** to minimize visibility from areas of public view and **to preserve the character and existing environment of the area**.

It also states: **Rights-of-way** clearing **should be kept to the minimum width necessary**. **In selecting a method to clear rights-of-way**, soil stability and **protection of** natural vegetation and **adjacent resources** **should be taken into account**.

Taken collectively, we believe that this project fails to meet the requirement of the FERC regulations in that it does not avoid a park and the recreational Visitor's Docks, despite the fact that there are likely alternatives available; that it will require rights of way clearing that will not minimize the impacts to the Visitor's Docks; that it does not take make attempts to minimize the impacts to/preserve the character of and existing environment of the area.

We acknowledge that these same regulations apply to overhead transmission lines, and were likely contributory to the abandonment of the first proposal for overhead siting of the lines. However, we reject the notion that the overhead transmission lines and monopoles might have presented a greater impact on the view of the harbor than the bulk and height of the selected design for the replacement of the Walk Bridge. Such an aboveground transmission line would, in fact, be harmonious with other structures in the area, where above-ground catenary lines and monopole connections are ubiquitous. They are even acknowledged as NR-eligible when they reside on a bridge of a certain age.

For the reasons cited above, we the Commission, respectfully urge all parties associated with this proposed project to revisit alternatives, which might include, but certainly aren't limited to:

- a) Re-routing the transmission line path through another part of the park to avoid the impacts to the Visitor's Docks
- b) Having the project sponsor pay to relocate the Visitor's Docks outside of the utility rights-of-way required by this project
- c) Consider avoiding the harbor altogether and return to an aboveground transmission structure in CDOT's right-of-way
- d) Having the CSC require that the project undergo the environmental review and apply for a Certificate of Environmental Compatibility and Public Need, including robust public participation, for the protection of Norwalk's residents and its harbor resources

The TTD welcomes discussion with all parties involved to seek a mutually acceptable alternative that protects the public interest in the park, the harbor, and electricity supply; as well as the safety of the stakeholders in the City of Norwalk (and particularly those of East Norwalk).

Sincerely,

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David L. Brown, Chairman  
The Third Taxing District – City of Norwalk

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Debora Goldstein, Commissioner  
The Third Taxing District – City of Norwalk

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Pamela Parkington, Commissioner  
The Third Taxing District – City of Norwalk

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Johnnie Mae Weldon, Treasurer  
The Third Taxing District – City of Norwalk





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May 14, 2018

Federal Energy Regulatory Commission  
Office of the General Counsel  
Room 10A-01  
ATTN: Request for No-Action Letter  
888 First Street, N.E.  
Washington, DC 20426

**RE: No-Action Letter Inquiry by the Third Taxing District – City of Norwalk Regarding CP-241 Walk Bridge Replacement Project 115kv Transmission Line Relocation by Eversource Energy in Norwalk, CT**

Dear Office of the General Counsel,

We, the Commission of the Third Taxing District-City of Norwalk ("TTD"), representing the body politic of a separate municipal corporation within the City of Norwalk<sup>1</sup> which operates a municipal electric utility within the Third Taxing District of the City of Norwalk, are writing pursuant to section 388.104(a) of the Commission's regulations<sup>2</sup>, as clarified in response to the Energy Policy Act of 2005<sup>3</sup> to inquire whether a no-action letter could be issued with regard to CP-241 Walk Bridge Replacement Project (115kv Transmission Line Relocation) by Eversource Energy in Norwalk, CT.

### I. Background

According to the *Environmental Assessment/Section 4(f) Evaluation/Environmental Impact Evaluation for State Project No. 0301-0176 Walk Bridge Replacement Project (August 2016)*:

Walk Bridge, constructed in 1896, is a four-span swing bridge that spans 564 feet over the Norwalk River. Walk Bridge consists of a deck truss swing span and three fixed approach spans; two fixed approach spans to the west of the swing span and one fixed approach span to the east of the swing span... Power for the trains is supplied by an overhead contact system (OCS). High towers are located on both sides of the Norwalk River.

These towers support overhead power transmission lines owned by Eversource Energy and Metro-North Railroad (Metro-North) power and communication lines [...] Walk Bridge carries four tracks of the New Haven Line (NHL) of Metro-North commuter service and also is used for intercity and high-speed passenger service by Amtrak on the Northeast Corridor (NEC). Walk Bridge also is used for freight service by the Providence & Worcester Railroad. (Page 1-1)

In response to recent bridge movement failures in May and June 2014, CTDOT established a Short Term Action Team (STAT) to determine the cause of operation failures and determine repairs to improve the system's reliability

<sup>1</sup> *Special Acts No. 352 (1933); Charter of the Third Taxing District of the City of Norwalk*, Section 1-114. Under the definition of "municipality" found in 7-233b (9), TTD is a municipality by virtue of ownership of an electric utility with the authority to "produce, supply or distribute electric energy". The TTD is governed by three elected commissioners with full municipal powers, including the authority to tax and to make appropriations under the charter Sec. 1-114; 117-118, and who function as the legislative body of the municipality.

<sup>2</sup> 18 C.F.R. § 388.104(a) (2005); 113 FERC ¶ 61,174 (2005).

<sup>3</sup> Pub. L. No. 109-58, 119 Stat. 594 (2005) (codified in scattered titles of the U.S.C.); 123 FERC ¶ 61,157 (2008).

#### District Commissioners

David L. Brown 203-866-8099  
Debora Goldstein 203-252-7214  
Pamela Parkington 203-858-4261

Chairman  
Commissioner  
Commissioner

Kevin Barber  
Ron Scofield  
Johnnie Weldon

203-866-9271  
203-866-9271  
203-216-2652

General Manager  
Assistant General Manager  
Treasurer

[...] Also in July 2014, the Commissioner of CTDOT issued an Emergency Declaration for the Walk Bridge.<sup>4</sup> (Pages 1-3, 1-4)

Two high towers, located on the east and west sides of the Norwalk River over the rail corridor, carry 22 Metro-North aerial power conductors and aerial communication/signal cables, and eight Eversource Energy 115kV transmission lines. The towers are steel latticed frame, and were constructed in 1912 and rehabilitated in 1990. The tower frames consist of a rigid H-configuration with two lower legs, three horizontal struts connecting the legs, and two sets of primary cross bracing between the lower legs. The towers originally had a height of 199 feet above the base, but were later modified with overbuilds (for the Eversource power lines), increasing their height to approximately 235 feet. (Page 3-4)

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The Build Alternative will remove the high steel lattice towers on either side of the river that carry transmission lines over the channel. (Page 3-154)

Due to the removal of the high towers, Eversource Energy high voltage transmission lines that currently cross the Norwalk River on the high towers will require relocation. The relocation of the utility functions on the high towers is not part of the Walk Bridge Replacement Project, but will be an indirect effect of the project. The Eversource power relocation will undergo a separate environmental evaluation and permitting process, which will include opportunities for public review and comment. Eversource Energy will be responsible for relocating its lines and the associated environmental evaluations and permits. (Page 3-171)

The relocation of the overhead electric transmission lines may require approval from the Connecticut Siting Council (CSC). Should CTDOT lead the transmission line relocation, then approval from the CSC may not be required. Should the utility company (Eversource) lead the transmission line relocation effort, then CSC review and approval, including a Certificate of Environmental Compatibility and Public Need, would be required. NEPA review and site-specific permits also could be required for the utility line relocation. (Page 7-3)

Initially, the relocation of the transmission lines contemplated by a high tower feasibility plan resulting from plans to replace the Walk Bridge contemplated aboveground placement of the lines.<sup>5</sup>

After a period of time, Eversource Energy, in consultation with the City of Norwalk and CDOT, had completely revised the plan to instead provide for undergrounding of the transmission lines beneath Norwalk Harbor and portions of Veterans Memorial Park. This option was presented as the best of fourteen options that were considered.<sup>6</sup> At this time, no application has been presented to the Connecticut Siting Council, though Eversource Energy has undertaken a pre-application review process, which lays out the path and plan for the project.<sup>7</sup>

## II. Discussion

The proposed route, under the harbor, through the Visitor's Docks and under a section of Veterans Memorial Park presents a question as to whether it is in compliance with section 380.15 of the Commission's regulations. We note the proximity of Norwalk's economically and ecologically vital shellfish beds, which supplies seafood to much of the East Coast and as far away as Texas (an adjacent resource; wildlife lands that should be avoided to the extent practicable). The project requires both trenching and horizontal directional drilling in an area which has historically been home to manufacturing of all kinds, including several hat factories (making it difficult to minimize

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<sup>4</sup> CTDOT, *Emergency Declaration Railroad Swing Bridge No. 04288R, Norwalk, Connecticut*, July 8, 2014.

<sup>5</sup> *Norwalk task force demands project manager as DPW leader begs for help with ConnDOT*, Nancy on Norwalk, August 3, 2016 (<https://www.nancyonnorwalk.com/2016/08/norwalk-task-force-demands-project-manager-as-dpw-leader-begs-for-help-with-conndot/>)

<sup>6</sup> *Eversource presents proposed route for 115-kilovolt transmission lines*, The Hour, May 26, 2017 (<https://www.thehour.com/news/article/Eversource-presents-proposed-route-for-11171856.php>)

<sup>7</sup> Letter from Eversource Energy to the Norwalk Harbor Management Commission, February 20, 2018.



effects on wildlife), and will be routed through Veterans Memorial Park (an officially designated park, which should be avoided).

The Commission takes note of the objections of the Norwalk Harbor Management and the Norwalk Shellfish Commissions with regard to the proposed route through the Visitor's Docks (recreational areas, which should be avoided).<sup>8 9</sup>

The Commission has had an opportunity to review the report of the expert retained by the Norwalk Harbor Management Commission to conduct an independent peer review, dated March 26, 2018<sup>10</sup> and recognize concerns about possible environmental impacts from the drilling process near the shellfish beds, and the possibility that the drill path accuracy cannot be guaranteed. We note that even accurately positioned transmission lines in this proposal require protective zones (rights-of-way, which should be kept to the minimum width necessary) which will prevent or severely inhibit the ability to maintain or expand sections of the Visitor's Dock.

Furthermore, the expert's report raises the possibility that, once dug, it may not be possible to know the exact path of the transmission lines under the harbor with certainty, which can inhibit future activities such as dredging, maintenance/expansion of the Visitor's Docks or other harbor-related activities (which would not preserve the character and existing environment of the area).

### III. Conclusion

Given the questions raised in connection with section 380-15, and the very obvious prospect of avoiding the proposed location as a practicable alternative (the original overhead transmission line proposal), the Commission felt compelled to inquire as to whether it is possible to receive a no-action letter with respect to this project.

As required by the *No Action Order* (113 FERC ¶ 61,174 at P 11), attached hereto is a statement verifying the accuracy of the contents of this letter. If you have any questions or require any additional information regarding this request, please contact Commissioner Debora Goldstein (203) 252-7214 or via email at dgoldstein@ttd.gov.

Sincerely,

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David L. Brown, Chairman  
The Third Taxing District – City of Norwalk

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Pamela Parkington, Commissioner  
The Third Taxing District – City of Norwalk

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Debora Goldstein, Commissioner  
The Third Taxing District – City of Norwalk

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Johnnie Mae Weldon, Treasurer  
The Third Taxing District – City of Norwalk

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<sup>8</sup> Letter from the Norwalk Harbor Management Commission to Eversource Energy, April 9, 2018.

<sup>9</sup> Letter from the Norwalk Shellfish Commission to Third Taxing District, April 16, 2018.

<sup>10</sup> Letter from Mitchell Mailman to Chair, Application Review Committee, Norwalk Harbor Management Commission, March 26, 2018



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### VERIFICATION

After being duly sworn, John Olsen states that he is the Executive Director. Bulk Power Marketing, of Westar Energy, has personal knowledge of the circumstances described above, and has the authority to verify this request for a no-action letter. He hereby affirms that that all of the factual assertions in the request are true, complete and accurate, to the best of his knowledge, information and belief formed after a reasonable inquiry.

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Debora Goldstein, Commissioner  
Third Taxing District – City of Norwalk

Subscribed and sworn to before me on this \_\_\_\_ day of May, 2018.

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Notary

My commission expires \_\_\_\_\_

#### *District Commissioners*



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**FERC**

FEDERAL ENERGY REGULATORY COMMISSION

**File a Request for No-Action Letter**

On November 18, 2005, the Commission issued an ["Interpretive Order Regarding No-Action Letter Process"](#)  in Docket PL06-4-000, detailing the No-Action Letter submission process. The Commission provided clarification on the process in its ["Interpretive Order Modifying No-Action Letter Process"](#)  in Docket PL06-4-001.

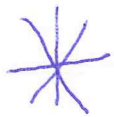
Please use the following guidelines when filing Request for No-Action Letters.

**What to Submit:** Submit one original and two paper copies of the request, along with a text-searchable file (or files) on a 3 1/4" diskette or CD-ROM. Each page of the request and any supporting information or documents should include a header or footer stating "Request for No-Action Letter."

**Contact Info:** Each request must include the name, address, telephone number, and email address of the person to whom the response should be directed.

**Where to Submit:** Send your request to:

Federal Energy Regulatory Commission  
Office of the General Counsel  
Room 10A-01  
ATTN: Request for No-Action Letter  
888 First Street, NE  
Washington, DC 20426



Use express mail or courier services to submit a Request for No-Action Letter to FERC. Regular mail sent through the US Postal Service to the Commission is subject to a 7-10 day delay for scanning. The scanning process also may destroy any diskettes and CD-ROMs included in the submittal.



The Commission determined that when initially filed a Request for No-Action Letter is non-public material. The Commission's eFiling system is not ready to accept non-public material at this time and, therefore, it is not available for the filing of Requests for No-Action Letters.

**CONTACT****FERC Online Support**

Email:

[ferconlinesupport@ferc.gov](mailto:ferconlinesupport@ferc.gov)[Telephone Numbers](#)**QUICK LINKS**[No-Action Letters](#)[Energy Policy Act of 2005](#)

*Updated: November 12, 2013*

Addressees for the Agency letter objecting to the Eversource Undergrounding Project:

- ✓ Mr. Ian Cole, Eversource Energy, Environmental Licensing and Permitting
- ✓ Mayor Harry W. Rilling
- ✓ Mr. Mario Coppola, Corporation Counsel
- ✓ Mr. Micheal Grzywinski, DEEP LWRD
- ✓ Mr. Ken Hughes, Norwalk Recreation and Parks Department
- ✓ Mr. Pete Johnson, Chair, Norwalk Shellfish Commission
- ✓ Ms. Susan Lee, USACE
- ✓ Mr. Ed O'Donnell, USACE
- ✓ Mr. Joe Perella, Chair, NHMC
- ✓ Mr. John Pinto, Chair, Applications Review Committee, NHMC
- ✓ Mr. Joe Salvatore, CT Port Authority
- ✓ Mr. Robert Stein, CT Siting Council
- ✓ Mr. Frank Strauch, Norwalk Planning and Zoning

Mayor Harry Rilling  
City of Norwalk  
125 East Avenue  
P.O. Box 5125  
Norwalk, CT 06856-5125

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Peter Johnson  
Norwalk Shellfish Commission  
46 Gregory Blvd.  
Norwalk, CT 06855

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Ken Hughes  
Acting Director, Recreations & Parks  
City of Norwalk  
125 East Avenue, Room 129  
Norwalk, CT 06851-5125

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Frank Strauch  
Site Planner, Planning & Zoning  
City of Norwalk  
125 East Avenue, Room 223  
Norwalk, CT 06856

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Atty.  
~~Atty.~~ Mario Coppola.  
Berchem Moses PC  
1221 Post Road East  
Westport, CT 06880



Mr. Robert Stein  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

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Joseph Salvatore  
Connecticut Port Authority  
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Hartford, CT 06106-7106

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Ms. Susan Lee  
U.S. Army Corps of Engineers  
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Ed O'Donnell  
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Michael Grzywinski  
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Jean Cole  
Sr. Environmental Specialist  
EVERSOURCE Energy  
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## Harbor Management Commission

All correspondences to Commission members should be directed to the Harbor Management Commission, 125 East Avenue, PO Box 5125, Norwalk CT, 06856-5125 or via Site Planner Frank Strauch at: [strauch@norwalkct.org](mailto:strauch@norwalkct.org)

Regular Member	g	Alternate Member	0
Staff Person	Michael Wrinn, Acting Plannir	Term	4 Years
Appointed By	Mayor-Council	Source	Nwtk. Code 69
Meeting Date	4th Wednesday	Meeting Location	P & Z Conference Room

Member	Party	Term Expires	Alt	Address	City/State/Zip	Dist.	Note
AITORO, ANTHONY	R	12/31/2018	<input type="checkbox"/>	198 GREGORY BOULEVARD	NORWALK, CT 06851		
CRESPO, JOHN	D	12/31/2021	<input type="checkbox"/>	4 DASKAMS LANE UNIT 304	NORWALK, CT 06851		
GARDELLA, SR., WILLIAM T.	R	12/31/2019	<input type="checkbox"/>	17 ISLAND DRIVE	NORWALK, CT 06855		
MOBILIA, ANTHONY	D	12/31/2021	<input type="checkbox"/>	47 ALLEN ROAD	NORWALK, CT 06851		
PERELLA, JOSEPH A.	D	12/31/2019	<input type="checkbox"/>	5 GIRARD STREET	NORWALK, CT 06850		Chair
PINTO, JOHN	R	12/31/2021	<input type="checkbox"/>	131 WINFIELD STREET	NORWALK, CT 06855		
ROMANO, JOHN	R	12/31/2020	<input type="checkbox"/>	179 EAST ROCKS ROAD	NORWALK, CT 06851		
SANTELLA, DENNIS	R	12/31/2019	<input type="checkbox"/>	131 WINFIELD STREET	NORWALK, CT 06855		
SCHAEFER, JAN	R	12/31/2018	<input type="checkbox"/>	61 NEPTUNE AVENUE	NORWALK, CT 06854		

Last Updated: 03/26/2018